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August 1, 2025

VIA ECF

United States District Court
Eastern District of New York
Attn: Hon. Kiyo A. Matsumoto, U.S.D.J.
225 Cadman Plaza East
Courtroom 6B South
Brooklyn, NY 11201-1804

**Re: Victoria NYC I Inc d/b/a Rx2Go v. DGN Pharmacy Inc d/b/a PersonalRx
Case No.: 1:25-cv-975 (KAM) (MMH)**

Dear Judge Matsumoto:

This firm represents the Plaintiff in the above-captioned case. Plaintiff writes to respectfully request a two (2) week extension of time to file its motion to seal and renew its motion for a default judgment as set forth in this Court's Order dated July 11, 2025.

Pursuant to ¶ II(E) of this Court's Chamber Practices, Plaintiff respectfully submits that: (1) the original date the motion(s) were due falls on today's date; (2) the reason for the request is because your undersigned had been preparing for a trial in the Nassau County District Court, First District, which took place on July 29, 2025 and needs additional time to submit the motions contemplated in this case; (3) Plaintiff respectfully requests two (2) additional weeks; (4) there have been no previous requests for an extension by Plaintiff for an extension of time; (5-7) Plaintiff did not meet-and-confer with all other parties to discuss alternative, mutually agreeable dates or seek consent because the Defendant is in default and (8) the requested extension does not affect any other scheduled dates.

Based on the foregoing, Plaintiff respectfully submits that sufficient good cause and excusable neglect exists to warrant this Court's exercise of discretion in favor of granting the requested extension of time. See Fed. R. Civ. P. 6(b)(1)(B). Plaintiff thanks this honorable Court for its time and attention to this case.

Dated: Jamaica, New York
August 1, 2025

Respectfully submitted,
SAGE LEGAL LLC
/s/ Emanuel Kataev, Esq.
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